

Exhibit B



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February 7, 2019

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VIA E-MAIL

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Re: *Mandala v. NTT Data, Inc.*
Civil Action No.: 18-6591 (WDNY)

Dear Counselor:

This acknowledges receipt of your letter dated February 4, 2019 in the above-referenced matter, and the accompanying documents. My apologies for the late reply, I have been traveling and in meetings all week. In light of the fact that the Court has yet to set a scheduling conference and Defendant has filed a motion to dismiss all of Plaintiffs' claims, in their entirety and with prejudice, we believe that a Rule 26(f) conference and discovery at this juncture is premature. Indeed, Courts routinely stay discovery and do not order the parties to participate in the Rule 26(f) conference until a defendants' motion to dismiss is decided. This makes eminent sense, as resolution of the motion to dismiss in Defendant's favor would eliminate the need for discovery entirely, and conserve both the Court and the parties' valuable resources. We also have significant concerns, given the facial insufficiency of Plaintiffs' complaint and the overbreadth of Plaintiffs' prematurely propounded written discovery, that Plaintiffs intend to use early discovery as a fishing expedition to bolster their Complaint which, as we have argued in our pending motion, is factually insufficient. Defendant reserves all rights, including its right to object, at a later and appropriate time, to Plaintiffs' vastly overbroad discovery demands when timely propounded.

Please do not hesitate to email or call me if you have any questions or would like to discuss.

Very truly yours,

/s/ Jessica F. Pizzutelli

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